

contrary to WorldCom's insinuations, Qwest's record in the Application states is not a fluke. Qwest's DUF has correctly designated DACC calls as "Sent-Paid" calls in the Application states precisely because Qwest's OSS was designed that way. The only state in which Qwest previously designated DACC calls as collect calls is Minnesota, but Qwest has since addressed the issue in that state.⁹⁸ There simply is no reason for WorldCom to continue to belabor this issue.

Rate Class: WorldCom claims that "in one of its regions" (WorldCom does not specify which one), Qwest is designating "pay-per-use" records as "operator station" (rate class three) rather than "dial station" (rate class four).⁹⁹ According to WorldCom, records with rate class three designations cause the calls to be included on the operator services portion of the end user's bill; but, because the DUF lists of the call as "pay-per-use," it also is included in the pay-per-use section of the end user's bill, which results in the detail appearing twice on the bill, rendering it confusing.¹⁰⁰ While Qwest may have at times been inconsistent in its classification of calls by region, that inconsistency is completely irrelevant because the record type and class feature type for such calls clearly define them as "pay-per-use," and the rate class should not be used on these types of records in determining what the rate will be for that call or where to place the charge on the end user's bill. In other words, WorldCom can use the record type (which classifies these records as "pay-per-use") and class feature type (which specifies the particular "pay-per-use" feature that was used) to determine where – and what – to bill its end users.

"I CALLED": WorldCom claims that Qwest began including records related to its "I CALLED" feature as "10018 (sic) records" on the DUF without indicating what that code was for.¹⁰¹ WorldCom now understands that "10018 (sic) records" represent the "I CALLED" feature and has coded its EMI accordingly. But WorldCom now states that Qwest sometimes transmits records relating to the "I CALLED" feature as "10019 (sic) records."¹⁰²

Until WorldCom raised this issue, Qwest was not aware that it was transmitting records relating to the "I CALLED" feature as "10019 records" in the Eastern region. To ensure that the records transmitted on the DUF for "I CALLED" are consistent throughout Qwest's region, Qwest plans to alter its practice in the Eastern

⁹⁸ WorldCom notified Qwest that it was receiving an incorrect "Special Collect" message for DACC records in the Eastern region on February 26, 2003. On March 11, 2003, a CMP notification was issued to the CLEC community identifying a correction to this issue that would be implemented the following day. The correction, however, would be made only to Minnesota, as that was the only state in which the incorrect message was occurring.

⁹⁹ See WorldCom March 24 Ex Parte at 11.

¹⁰⁰ See *id.*

¹⁰¹ See *id.*

¹⁰² See *id.* The actual records transmitted for "I CALLED" features are "100118" and "100119" (not "10018" and "10019" as WorldCom indicates). Regardless, both record types are valid for pay-per-use features.

region through the CMP process so that "100118 records" are transmitted there as well.¹⁰³ In the meantime, it is worth noting that the same information available to CLECs through "100118 records" in the Central and Western regions currently is available through "100119 records" to CLECs in the Eastern region, as the data provided in the two record formats is identical.¹⁰⁴

VII. REJECTIONS FOR CUSTOMERS WITH DIAL-UP ISP ACCESS

WorldCom claims that Qwest rejects orders for end users that have dial-up access to certain ISPs.¹⁰⁵ More specifically, WorldCom claims that Qwest rejects UNE-P migration orders for end users with dial-up access to certain ISPs unless those end users first disconnect their dial-up service with those ISPs.¹⁰⁶ But this is not quite correct. Because of special billing arrangements Qwest entered into with a certain ISP, Qwest required that its billing of the dial-up service had to be discontinued prior to converting end users that subscribed to it. But Qwest's rationale for doing so was not as nefarious as WorldCom suggests. Rather, Qwest was concerned that conversions without cancellations of the dial-up service would result in the billing arrangement not transferring appropriately. A CR was issued on this point, and Qwest's processes have since been revised to not reject conversions for customers of the ISP regardless of any unique billing arrangement.¹⁰⁷

Qwest has been using this revised process since March 13, 2003. Specifically, Qwest put into place a process under which the conversion request is processed and Qwest discontinues billing the end user on behalf of the ISP. Under these circumstances, it is up to the ISP to recognize that the billing arrangement has not transferred to the new provider and act accordingly.

WorldCom expresses concern regarding the manual nature of this new process and how Qwest will ensure the ISP bills properly.¹⁰⁸ While these conversions do not currently flow-through, the action taken by Qwest center personnel to process the conversion is not unique or complicated. Further, accounts that fall into this scenario do not represent a significant percentage of WorldCom's conversions.¹⁰⁹ Thus, this issue does not have a significant impact on WorldCom orders to begin with.

¹⁰³ See Attachment A12 (Event Notification Associated with PCRM Ticket #6195278).

¹⁰⁴ The inconsistency in "I CALLED" records is similar to other inter-region inconsistencies that KPMG found – and found to not be significant – when it tested Qwest's DUF. See *Final Report* at 414, Table 19-6, Test Cross-Reference 19-1-1 (noting that Qwest "created two different, yet acceptable, EMI record types for toll-free calls, specifically EMI record types 110105, and the more commonly used 110125").

¹⁰⁵ See WorldCom March 24 Ex Parte at 11-12.

¹⁰⁶ See *id.*

¹⁰⁷ See Attachment A13 (CMP Notice on PC022403-1EX).

¹⁰⁸ See WorldCom March 24 Ex Parte at 12.

¹⁰⁹ See Confidential Attachment A14 (WorldCom LSRs Received Subject to Special ISP Billing Arrangements Between March 17, 2003 to March 31, 2003).

**CONFIDENTIAL REPLY EXHIBIT LN-1
FOR PUBLIC INSPECTION**

EDI Resale POTS Conversion-as-Specified Order Transactions from February 1, 2002, through January 31, 2003[illegible]

ATTACHMENT A1

EDI UNE-P POTS Conversion-as-Specified Order Transactions from February 1, 2002, through January 31, 2003

[illegible]

**CONFIDENTIAL REPLY EXHIBIT LN-1
ATTACHMENT A2
For Public Inspection**

PO-4B Reject Rates¹ for Selected CLECs²

RPT	MON	CD	271D	PROD	CD	NAME	LABEL	CLEC 1 ³	CLEC 2 ⁴	CLEC 3 ⁵
-----	-----	----	------	------	----	------	-------	---------------------	---------------------	---------------------

[4 pages redacted]

¹ The PO-4B reject rates set forth above are associated with a broader set of activity types than just conversion-as-specified orders.

² The three CLECS above were selected by Qwest because they were the higher volume CLECs listed in the CLEC EDI UNE-P POTS and Resale POTS Conversion-as-Specified Order Transactions Attachment.

³ [Redacted: Dates of Production]

⁴ [Redacted: Dates of Production]

⁵ [Redacted: Dates of Production]

**CONFIDENTIAL REPLY EXHIBIT LN-1
ATTACHMENT A3**

Qwest I July 29A, 2002 Ex Parte (WC Docket 02-148)

HOGAN & HARTSON
L.L.P.

July 29, 2002

COLUMBIA SQUARE
555 THIRTEENTH STREET, NW
WASHINGTON, DC 20004-1109
TEL (202) 637-5600
FAX (202) 637-5910

Ex Parte – REDACTED – FOR PUBLIC INSPECTION

BY HAND DELIVERY

Marlene H. Dortch
Secretary
Federal Communications Commission
445-12th Street, S.W., TW-B204
Washington, D.C. 20554

**Re: Application of Qwest Communications International, Inc.
To Provide In-Region InterLATA Services in the States of
Colorado, Idaho, Iowa, Nebraska and North Dakota,
Docket No. 02-148**

Dear Ms. Dortch:

In response to questions from Commission staff, Qwest is providing information regarding its offering of pre-order to order integration capabilities. Specifically, Qwest is providing LSR rejection rates for New Access, a CLEC that performs integrated pre-order and order functions through IMA-EDI in Colorado, Iowa, Nebraska and North Dakota as of June 2002. Additionally, Qwest is providing LSR rejection rates for Hewlett-Packard Consulting, the pseudo-CLEC that performed integrated pre-order and order functions through IMA-EDI during the ROC OSS test. This material is hereby submitted for inclusion in the record for the above-referenced proceeding.

BRUSSELS BUDAPEST LONDON MOSCOW PARIS* PRAGUE WARSAW

BALTIMORE, MD BETHESDA, MD COLORADO SPRINGS, CO DENVER, CO LOS ANGELES, CA MCLEAN, VA

\\DC - 66983/0030 - 1576142 v1

*Affiliated Office

HOGAN & HARTSON LLP

Marlene H. Dortch
July 29, 2002
Page 2

The twenty-page limits do not apply as set forth in DA 02-1390.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sumeet Seam', with a long horizontal flourish extending to the right.

Sumeet Seam

Enclosures

cc: M. Carowitz
M. Engel
R. Tanner
E. Yockus
G. Remondino
M. Cohen
J. Prisbey
J. Jewel
P. Baker
C. Post
P. Fahn
B. Smith

Actual commercial usage as well as independent third-party testing demonstrate that CLECs that have developed integrated interfaces can achieve low rates of rejected LSRs. New Access, a CLEC that operates in Colorado, Iowa, Nebraska and North Dakota, has affirmed that it performs pre-order/order integration through its IMA-EDI interface as of June 2002. See Qwest July 25 Ex Parte on Pre-order to Order Integration.

[REDACTED - FOR PUBLIC INSPECTION]

HP's findings during the ROC OSS test further confirm that achievement of successful integration through IMA-EDI is associated with a low rate of rejections. As indicated in the attached e-mail and tables, for the four months between January 2002 and April 2002, out of a total of 889 UNE-P retest orders that HP submitted via its integrated IMA-EDI interface, only 12.15% of these orders were rejected. Additionally, HP affirmed that the errors that caused those rejects were attributable to issues unrelated to pre-order to order integration. These data from New Access and HP demonstrate that Qwest's offering of parsing and integration capabilities have enabled them to submit a very high percentage of orders that are not rejected.

New Access Reject Rates (June 2002)

REDACTED-FOR PUBLIC INSPECTION

-----Original Message-----

From: Don Petry [mailto:dpetry@ix.netcom.com]
Sent: Friday, July 26, 2002 4:18 PM
To: ROC TAG Members
Cc: Geoff May
Subject: RE: Request for Information

Pursuant to Qwest's request to provide an analysis of the most recent 4 months of reject information for UNE-P LSRs in the ROC OSS PID re-test, HP provides the following summary and attached information.

Table 1 and Chart 1 represent the P-CLEC UNE-P PID re-test LSR activity via IMA EDI for the last four months of the ROC 271 test.

Table 1 and Chart 1 reflect the number of Original, Supplemental and FATAL reject transactions for the UNE-P Product.

Table 2 on the Error Analysis tab of the Excel spreadsheet shows the number of FATAL rejects by Category. Column C lists Examples of Error Messages received by the P-CLEC.

As described in the HP Final Report, HP integrated the address information from the pre-order transaction into the End User form. Issues not related to pre-order/order integration generated these 108 FATAL rejects.

Don Petry
770-861-9621

for

Geoff May
HP Services Consulting & Integration
978-376-3773

Table 1

Month	Original LSRs	Supplemental LSRs	Total LSRs		FATAL Reject	% of Transactions Rejected
Jan-02	545	12	557		81	14.54%
Feb-02	297	2	299		24	8.03%
Mar-02	1	0	1		0	0.00%
Apr-02	29	3	32		3	9.38%
Totals	872	17	889		108	12.15%

Chart 1

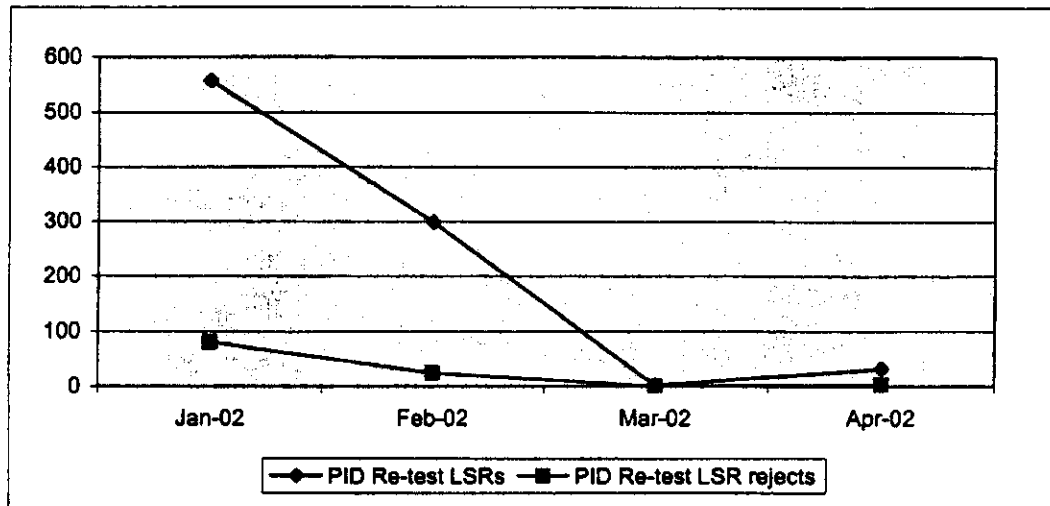


TABLE 2

Category	# of instances	Examples of Error messages
USOC issues	24	
		RESALE Form:Service Details Section:Invalid USOCs - problems with Validity, Resellability, State or Contract: OC1
		RESALE Form:Service Details Section:Invalid USOCs - problems with Validity, Resellability, State or Contract: 999AL
		RESALE Form:Service Details Section:Invalid USOCs - problems with Validity, Resellability, State or Contract: UXTA3
		RESALE Form:Service Details Section:Invalid USOCs - problems with Validity, Resellability, State or Contract: HSO
Data Entry/ Template Error	47	
		LSR Form:Admin Section:AN required when ACT is Z
		RESALE Form:Service Details Section 2:LNUM required when ACT is Z
		LSR Form:Admin Section:DDD cannot be earlier than current date
		LSR Form:Admin Section:LSO required when APTCON is not populated and LNA is N
		DSR Form:DL Form 1:Listing Control Section:DOI required when ACT is N
Data Mismatch &	37	
Test Bed Issues		LSR Form:Admin Section:TOS does not match SCATEG on reserved TN
		Invalid NPA-NXX/State combination: 208-338/CO
		End User Name, TN, and/or address are inconsistent
		Could not find original Work Order ID for supplement
		(redacted) does not match PON used in Pre-order TN reservation (redacted) for TN redacted
Total	108	

**CONFIDENTIAL REPLY EXHIBIT LN-1
FOR PUBLIC INSPECTION
ATTACHMENT A4**

**Orders Submitted by AT&T for Conversion-As-Specified for UNE-P and
Excerpt from December 24, 2001 Performance Results of AT&T UNE-P
Trial in Minnesota (PO-4B)**

[2 pages redacted]



AT & T
Minnesota
December 2000 - November 2001

December 24, 2001

**CONFIDENTIAL REPLY EXHIBIT LN-1
ATTACHMENT A5**

**Letter from Geoff May, Hewlett-Packard, to Marlene H. Dortch, Secretary,
Federal Communications Commission, WC Docket No. 02-148
(filed August 6, 2002)**



Geoff May
Managing Consultant
Hewlett-Packard Services
Consulting & Integration
29 Burlington Mall Road
Burlington, MA 01803
978.376.3773

FILED ELECTRONICALLY VIA ECFS

August 6, 2002

**Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-204
Washington, DC 20554**

**Re: Ex Parte — Qwest Communications International, Inc.
Consolidated Application for Authority to Provide In-Region, Inter-
LATA Services in Colorado, Idaho, Nebraska and North Dakota, WC
Docket No. 02-148**

Dear Ms. Dortch:

On Monday, August 5, 2002, the undersigned and Don Petry, representing Hewlett-Packard ("HP"), met by telephone conference with Jon Minkoff of the FCC's Wireline Competition Bureau upon the initiative of Mr. Minkoff. The discussion concerned Mr. Minkoff's question concerning HP's activities during the ROC OSS test with regard to pre-order to order integration and the parsing of pre-order and order information. The discussion included references by HP to HP's sworn testimony before the Colorado Public Utilities Commission, and relevant excerpts are attached as exhibits to a summary of HP's answer.

The attached summary and exhibits are hereby submitted for inclusion in the record for the above-captioned proceeding.

Respectfully submitted,

**Geoff May
Hewlett-Packard**

Attachments

“Parsing” and Data Integration Performed by HP during the ROC OSS Test

Question:

Please review paragraph 158 of the FCC’s Texas Order (*In Re Application by SBC Communications Inc., Southwestern Bell Communications Services, Inc. d/b/a South Western Bell Long Distance Pursuant to Section 271 of the Telecommunications Act of 1996 To Provide In-Region, InterLATA Services in Texas*, CC Docket No. 00-65, Memorandum Opinion and Order, 15 F.C.C.R. 18354 (2000)).

Did HP as the Pseudo-CLEC during the ROC OSS Test build its own “parser” (i.e., as Telcordia apparently did during the Texas evaluation), or did HP utilize parsed information as received from Qwest with regard to its conclusions in Appendix B and C of HP’s ROC OSS Final Report regarding the ability of CLECs to successfully integrate preorder and order data?

Answer:

Qwest's IMA EDI implementation differs from the SWBT interface described in paragraph 153 of the FCC’s Texas Order.

"As an initial matter, we note that our analysis of integration is complicated in this instance by the fact that SWBT has chosen not to provide “parsed” address information at the preordering stage, but instead returns this information to competing LECs in an undifferentiated (or “concatenated”) string of alphanumeric characters. 412"

Telcordia's functionality testing, as described in paragraph 158, was performed at the request of the Texas Commission and included development of a parsing program. However, HP's Pre-Order/Order integration processes did not have to parse any undifferentiated data as Qwest's IMA EDI interface provides CLECs with Pre-Order, Order and Post-Order information in a "parsed" or "fielded" format. Each individual data element is defined in the Qwest IMA EDI Disclosure documentation with the associated business rules and format characteristics.

As documented in the HP Pre-Order/Order Integration Field Comparison Reports - Analysis of Qwest IMA EDI Releases 7.0 & 8.0, HP developed and implemented the following functionality based upon publicly available Qwest documentation:

- Pre-Order response to Pre-Order query integration for address related data
- Pre-Order response to Order integration for address related data
- Customer Service Record (CSR) to Order integration for Resale POTS & UNE-P POTS

HP successfully developed and implemented integration of the data from an Address Validation Response (AVR) into other transactions. HP's data entry application retained the address information that was returned by Qwest and subsequently used this information to populate address related fields in the following pre-order queries:

- Address Validation Query (AVQ)
- Customer Service Record Query (CSRQ)
- Facility Availability Query (FAQ)
- Service Availability Query (SAQ)
- Telephone Number Availability Query (TNAQ)
- Raw Loop Data Query (RLDQ)
- Meet Point Query (MPQ)

Additionally, HP was able to integrate this address information into the following order related forms:

- Local Service Request (LSR)
- End User (EU)
- Resale Private Line (RPL)
- Directory Listing (DL)

HP also successfully developed and implemented integration of the Services and Equipment data from a Customer Service Record Response (CSRR) onto an order for Resale POTS or UNE-P POTS services. HP's data entry application retained (by telephone number) the service and equipment information that was returned by Qwest and subsequently used this information to populate service detail sections of the Resale form for a Resale POTS or UNE-P POTS order.

This information is documented in Section 5 - P-CLEC Data Integration, pages 38-39 of the HP Pre-Order/Order Integration Field Comparison Report - Analysis of Qwest IMA EDI Release 7.0.

HP provided sworn testimony during a hearing on June 10, 2002 in the matter of the Colorado Public Utilities Commission's Recommendation to the Federal Communications Commission Regarding Qwest Corporation's Provision of In-Region InterLATA Service in Colorado (Docket No. 02H-260T). During examination, HP testified generally as to its work regarding pre-order to order integration (Exhibit A). HP also provided testimony in response to questions from Mr. Thomas Dixon representing WorldCom about parsing, preorder to order integration by HP during the ROC test, and HP's Pre-order to Order Integration Report for the Arizona Corporation Commission (Exhibit B). Finally, HP testified in response to rebuttal examination from Mr. Andrew Crain of Qwest regarding Mr. Dixon's questions (Exhibit C).

August 6, 2002

HP Ex Parte

Exhibit A

Colorado En Banc Hearing 6/10/02

Transcript Excerpt



invent

1 BEFORE THE PUBLIC UTILITIES COMMISSION

2 OF THE STATE OF COLORADO

3 Docket No. 02M-260T

4 * * *

5 IN THE MATTER OF THE COLORADO PUBLIC UTILITIES

6 COMMISSION'S RECOMMENDATION TO THE FEDERAL

7 COMMUNICATIONS COMMISSION REGARDING QWEST

8 CORPORATION'S PROVISION OF IN-REGION, INTERLATA

9 SERVICES IN COLORADO.

2

1 P R O C E E D I N G S

2 CHAIRMAN GIFFORD: Good morning,

3 everyone. We'll call Docket 02M-260T. We are here

4 this morning for workshops concerning the ROC OSS test

5 and data reconciliation.

6 We'll begin the morning by taking

7 entries of appearance, starting to my left.

8 Mr. Crain or Ms. Ciccolo?

9 MS. CICCOLO: Good morning,

10 Mr. Chairman, Commissioners. Kris Ciccolo and Andrew

11 Crain appearing on behalf of Qwest.

84

17 EXAMINATION

18 BY MR. CRAIN:

19 Q. On page 9 of what is marked as Exhibit 3,

20 your presentation today, the bottom two highlights or

21 analysis areas included preorder to preorder data

22 integration and preorder to order data integration.

23 Can you explain the actual work you did to build the

24 integrated interface between preorder and order?

25 MR. PETRY: Yes, Mr. Crain.

1 HP built an order entry tool that was
2 used during conducting of the test, similar to what a
3 CLEC would do in terms of building both a front end
4 system that allows their customer service
5 representatives to enter and access data as well as
6 provide a gateway to the Qwest OSS.

7 In developing that tool, we did analysis
8 of the Qwest's preorder transactions and the data that
9 was respond -- returned back in those transactions.

10 We also looked at Qwest order
11 transactions and data that was necessary to be
12 populated on those orders that would have a -- a CLEC
13 would obtain that information from the preorder
14 transactions that they did such as an address
15 validation. Once you had validated the address for the
16 service address, that information was used not only for
17 other preorder transactions, but also to then be
18 populated on the order as the service address.

19 HP's IT staff built a technology within
20 our harness to capture that information coming back
21 from the preorder, hold that available to the customer
22 service representative, and allow them to then populate
23 or integrate that in a mechanized fashion into the
24 order as they were moving down to that next step.

25 Q. So the actual interface that HP used

1 during the test was integrated to the extent that it
2 took preorder information and automatically populated
3 the order information with that and -- to submit LSRs?

4 A. (MR. PETRY) Yes. And for clarification,
5 the "automatically" is the customer service
6 representative would have had to have selected the
7 appropriate address. This might make -- that they were
8 using for that order.

9 Q. But the customer service representative
10 didn't actually have to retype that information?

11 A. No, they did not have to retype the
12 information. That is correct.

13 Q. Now, you have two reports also mentioned
14 on -- and I apologize --

15 MR. MAY: Appendix B, the Qwest reports.

16 MR. CRAIN: I'll find the page.

17 BY MR. CRAIN:

18 Q. On page 20 of Exhibit 3, Appendix B and
19 Appendix C; and can you explain the analysis, the field
20 comparison you did in those appendices?

21 MR. PETRY: Yes. In doing comparison,
22 the analysis for Appendix B and Appendix C, we took the
23 Qwest documentation, the IMA EDI disclosure
24 documentation, which is the official Qwest
25 documentation for that interface; we compared the Qwest

1 documentation against itself so that if there were --
2 you had a field that was part of an address and it was
3 used in four or five different transactions, we
4 compared across Qwest transactions looking for
5 consistency and format and ability to be integrated.

6 We also compared Qwest documentation
7 against industry publications such as the TCIF,
8 Telecommunications Industry Forum mechanized
9 specifications; and the ASC-X-12, the Accredited
10 Standards Committee X-12 standards documentation. And
11 the results of that analysis are captured in HP's
12 Appendix B and Appendix C of the final report.

13 Q. And what was the ultimate purpose of the
14 preorder integration field comparison report? What was
15 it intended to determine?

16 A. According to the master test plan,
17 Section 12 -- I believe .6, there are several -- three
18 or four references in the master test plan that call
19 for an evaluation of the preorder-order integration.
20 HP conduct the analyses of these documentation to
21 fulfill that as well as the actual implement --
22 developed implementation that we did in our front-end
23 ordering tool to facilitate actual execution of the
24 test.

25 Q. And I don't know if we have the report --

1 final report marked as an exhibit. If we --

2 CHAIRMAN GIFFORD: I know we filed it
3 separately and it's in this record. So I think you can
4 feel free to refer to it.

5 MR. CRAIN: Okay.

6 BY MR. CRAIN:

7 Q. Then if I look at page 39 of Exhibit B,
8 which is the preorder-order integration field
9 comparison report on 8.0, can you -- is this paragraph
10 the summary of your findings?

11 A. (MR. PETRY) yes.

12 Q. Can you read this paragraph, please.

13 A. (MR. PETRY) reading from HP Appendix B,
14 the preorder/order integration field comparison report
15 analysis of Qwest IMA EDI Release 8.0, page 39: The
16 integration process is highly dependent on the internal
17 application system(s), EDI translator, telecom
18 experience, and integration experience of the CLEC.
19 With that stated, HPC does not feel that there are any
20 issues that would prohibit a CLEC from integrating
21 Qwest data with their internal application system(s).
22 This does not mean that there are not issues that would
23 have to be resolved between Qwest and the CLEC but
24 simply that these issues are not in surmountable."

25 MR. CRAIN: I have no further questions.